

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA

FILED

NOV 26 2019

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Chattanooga

UNITED STATES OF AMERICA

v.

TEELA MOORE HENDRIX  
ANTHONY BRETT BANKS

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No. 1:19-CR-139

JUDGES CLC/SKL

**FIRST SUPERSEDING INDICTMENT**

**COUNT ONE**

**(Conspiracy to Exploit a Child)**

The Grand Jury charges that, starting in or about January 2019, and continuing thereafter until on or about April 2019, in the Eastern District of Tennessee and elsewhere, the defendants TEELA MOORE HENDRIX and ANTHONY BRETT BANKS, knowingly and willfully conspired and agreed together and with each other, and with others known and unknown to the Grand Jury, to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported in interstate commerce; the visual depiction actually was transported in interstate commerce; and the visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2251(a).

All in violation of Title 18, United States Code, Section 2251(e).

**COUNT TWO**

**(Exploitation of a Child)**

The Grand Jury further charges that, starting in or about July 2018, and continuing until in or about April 2019, in the Eastern District of Tennessee, the defendant TEELA MOORE HENDRIX, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant

knew and had reason to know that the visual depiction would be transported in interstate commerce; the visual depiction actually has been transported in interstate commerce; and the visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a).

**COUNT THREE**  
**(Exploitation of a Child)**

The Grand Jury charges that, starting in or about January 2019, and continuing until in or about April 2019, in the Eastern District of Tennessee and elsewhere, the defendant ANTHONY BRETT BANKS, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that the visual depiction would be transported in interstate commerce; the visual depiction actually has been transported in interstate commerce; and the visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means.

All in violation of Title 18, United States Code, Section 2251(a).

**COUNT FOUR**  
**(Transportation of Child Pornography)**

The Grand Jury further charges that, starting in or about January 2019 and continuing until in or about April 2019, in the Eastern District of Tennessee and elsewhere, the defendant TEELA MOORE HENDRIX, did knowingly transport and ship in interstate and foreign commerce, and did knowingly attempt to transport and ship in interstate and foreign commerce, by any means including by computer, child pornography as defined in Title 18 U.S.C. § 2256(8).

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

**COUNT FIVE**  
**(Transportation of Child Pornography)**

The Grand Jury further charges that, starting in or about January 2019 and continuing until in or about April 2019, in the Eastern District of Tennessee and elsewhere, the defendant TEELA MOORE HENDRIX, did knowingly cause another person to transport and ship in interstate and foreign commerce, by any means including by computer, child pornography as defined in Title 18 U.S.C. § 2256(8).

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1); and, Title 18, United States Code, Section 2(b).

**COUNT SIX**  
**(Possession of Child Pornography)**

The Grand Jury further charges that in or about April 2019, in the Eastern District of Tennessee, the defendant TEELA MOORE HENDRIX, did knowingly possess material that contained images of child pornography, as defined in Title 18 U.S.C. § 2256(8)(A), that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, and at least one of the images depicted a minor who was less than 12 years of age, and which were produced using materials that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

**COUNT SEVEN**  
**(Creation of a Crush Video)**

At all times relevant to this Indictment, the following definitions apply:

1. Title 18 U.S.C. § 48(a) defines an “animal crush video” as any digital recording or electronic image in which one or more living non-human mammals is subjected to serious bodily injury. Serious bodily injury includes when such animal is subjected to conduct which, if committed against a person, would be a sexual assault as defined under Title 18 U.S.C. § 2241 and 2242.

2. In addition to other definitions of sexual assault, Title 18 U.S.C. § 2242(2) defines sexual assault to include engaging in a sexual act with a victim who is incapable of appraising the nature of the conduct, physically incapable of declining participation in, or communicating unwillingness to engage in the sexual act. Title 18 U.S.C. § 2241 and § 2242 incorporate the definition of a sexual act to include the penetration, however slight, of the anal or genital opening of another by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.

The Grand Jury further charges that, in or about July 2018, in the Eastern District of Tennessee, the defendant TEELA MOORE HENDRIX, did knowingly create an obscene animal crush video, as defined in Title 18 U.S.C. § 48(a), intending and having reason to know that such video would be distributed in interstate commerce, and such video was distributed in interstate commerce, and was created using a means and facility of interstate commerce, that is, using an internet capable cell phone comprised of parts manufactured and assembled outside the state of Tennessee, the defendant created, for the purpose of sexual gratification, a video of a dog being anally penetrated with her finger, which she distributed via the internet from the Eastern District of Tennessee to another individual outside the state of Tennessee.

All in violation of Title 18, United States Code, Section 48(b).

**COUNT EIGHT**  
**(Transportation of Child Pornography)**

The Grand Jury further charges that, starting in or about January 2019 and continuing until in or April 2019, in the Eastern District of Tennessee and elsewhere, the defendant ANTHONY BRETT BANKS, did knowingly transport and ship in interstate and foreign commerce, and did knowingly attempt to transport and ship in interstate and foreign commerce, by any means including by computer, child pornography as defined in Title 18 U.S.C. § 2256(8).

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

**COUNT NINE**  
**(Transportation of Child Pornography)**

The Grand Jury further charges that, starting in or about January 2019 and continuing until in or about April 2019, in the Eastern District of Tennessee and elsewhere, the defendant ANTHONY BRETT BANKS, did knowingly cause another person to transport and ship in interstate and foreign commerce, by any means including by computer, child pornography as defined in Title 18 U.S.C. § 2256(8).

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1); and, Title 18, United States Code, Section 2(b).

**FORFEITURE ALLEGATIONS**

1. The allegations contained in Counts One, Two, Three, Four, Five, Six, Eight, and Nine of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2251 and/or 2252A, the defendants, TEELA MOORE HENDRIX and ANTHONY BRETT BANKS, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to, the following:

COMPUTER EQUIPMENT

Samsung Galaxy 7

Motorola Moto E Plus

3. If any of the property described above, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,
- the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL:

GRAND JURY FOREPERSON

J. DOUGLAS OVERBEY  
United States Attorney

By:

James T. Brooks  
Assistant United States Attorney